

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:

WARREN A. ROYEA, SR. and  
GAIL M. ROYEA AKA GAIL M. MORITZ,

Debtors.

Bankruptcy No. 08-02603-MDF

(Chapter 13)

AMERICREDIT FINANCIAL SERVICES, INC.,  
AS SUCCESSOR IN INTEREST TO LONG  
BEACH ACCEPTANCE CORPORATION,

Movant,

Related to Document No. 44

Hearing Date/Time: December 2, 2008 - 9:30 a.m.

-vs-

WARREN A. ROYEA, SR. and  
GAIL M. ROYEA AKA GAIL M. MORITZ,

Respondents.

**STIPULATION RESOLVING MOTION FOR RELIEF  
FROM AUTOMATIC STAY**

WHEREAS, AmeriCredit Financial Services, Inc., as successor in interest to Long Beach Acceptance Corporation (hereinafter "creditor") moved for an Order, pursuant to 11 U.S.C. Section 362(d)(1), authorizing relief from automatic stay, or the granting of adequate protection herein; and

WHEREAS, debtors filed a response to said motion; and

WHEREAS, the parties have agreed to resolve the instant dispute by this Stipulation;

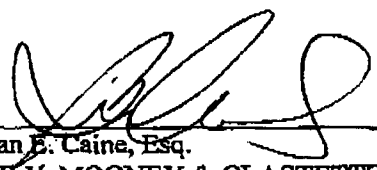
NOW THEREFORE, creditor and debtors hereby agree as follows:


1. That evidence of effective insurance shall be provided to secured creditor, AmeriCredit Financial Services, Inc., as successor in interest to Long Beach Acceptance Corporation, within ten (10) days of the entry of the Order Approving this Stipulation and in the event evidence of effective insurance is not timely received, AmeriCredit Financial Services, Inc., as successor in interest to Long Beach Acceptance Corporation may be entitled to file a Certificate of Default and request entry of a final order for relief from automatic stay.

2. The post-petition arrears on the debtors' obligation to the secured creditor with regard to one (1) 2007 Hyundai Tucson (V.I.N. KM8JN72D67U572686) is \$991.56 as of December 1, 2008. In addition, the debtor will reimburse the creditor for its attorneys fees in the amount of \$250.00 and costs of \$150.00 for bringing the motion for relief from the automatic stay and for attorneys fees and costs. The debtors will cure the post-petition arrears and attorneys' fees and costs by making payments in the amount of \$822.82 each for December 21, 2008, January 21, 2009, February 21, 2009, March 21, 2009, April 21, 2009 and May 21, 2009 (which includes the regular monthly payments for those months).

3. The debtors will continue to make the regular monthly payments under the loan documents in a timely fashion commencing with the payment due June 21, 2009.

4. In the event debtors fail to make any payment called for in this Stipulation, creditor may submit a certification of default and a proposed Order for Relief from Automatic Stay to the Court and serve a copy of such certification of default upon the debtors and counsel for debtors. Five days after receipt of a certification of default, the Court will enter an Order granting the creditor relief from the automatic stay unless the debtors has filed an objection to the certification of default specifying reasons for the objection; in which case the Court will set a hearing on the objection.


  
Brian E. Caine, Esq.  
DEILY, MOONEY & GLASTETTER, LLP  
Attorneys for AmeriCredit Financial Services, Inc.,  
as successor in interest to Long Beach Acceptance  
Corporation  
One Greentree Centre, Suite 201  
Marlton, NJ 08053-3105  
Fax No.: (856) 596-1923

  
Keith B. DeArmond, Esq.  
Attorney for Debtors  
11 East Market Street  
York, PA 17401

Date: 12/22/08

Date: December 5, 2008

Concurrence by Trustee:

  
Trustee